

# Federal Defenders OF NEW YORK, INC.

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
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*David E. Patton  
Executive Director  
and Attorney-in-Chief*

*Southern District of New York  
Jennifer L. Brown  
Attorney-in-Charge*

March 17, 2021

**VIA FAX**

Honorable Judge Laura Taylor Swain  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

**MEMO ENDORSED**

**Re: United States v. Selassie Sinclair  
21 Cr. 52 (LTS)**

Dear Judge Swain:

I write on behalf of my client Selassie Sinclair with consent from Assistant United States Attorney Sarah Kushner and United States Pretrial Officer Mohammed Ahmed, to respectfully request that the Court modify the conditions of the bond authorizing Mr. Sinclair to travel to our offices for the purposes of a psychological evaluation.

On January 12, 2021, Your Honor imposed the following bail conditions: A \$50,000 personal recognizance bond to be cosigned by two financially responsible persons; travel restricted to the Southern and Eastern Districts of New York; home incarceration with GPS monitoring; Remote Mental Health Evaluation/Treatment as directed by pretrial services; avoid all contact with all codefendants including his brother, Judah Sinclair, and surrender of travel documents with no new applications.

Mr. Sinclair plans to come into our offices at 52 Duane Street on March 19<sup>th</sup> and March 26<sup>th</sup>, from 2pm to 4pm to meet with an expert psychologist we have retained, Dr. Edward Fernandez. He will need to be out of his house from 1pm-5pm in order to accommodate his travel to our office.

Respectfully submitted,

/s/  
Marisa Cabrera  
Assistant Federal Defender  
Tel.: (212) 417-8730

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The foregoing modification is approved. DE# 29 resolved.

**SO ORDERED:**

/s/ Laura Taylor Swain 3/17/2021  
**HONORABLE Laura Taylor Swain**  
**United States District Judge**

**cc: Sarah L. Kushner, Esq., Assistant United States Attorney  
Mohammed Ahmed, Pretrial Services Officer**